



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

VERIZON NEW ENGLAND INC. D/B/A/ VERIZON MASSACHUSETTS
D.T.E. 03-50

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Verizon New England Inc. d/b/a Verizon Massachusetts ("Company") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and

support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.

5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department and on all parties; and submit one copy each to Julie Howley Westwater, Hearing Officer, Paula Foley, Assistant General Counsel, Mike Isenberg, Director, Telecommunications and Energy Division, and Debbie Alexander, Telecommunications and Energy Division.

INFORMATION REQUESTS

- DTE 1-1 Verizon states that "Verizon's metrics process and Carrier-to Carrier ("C2C") metrics guidelines are ubiquitous throughout the former Bell Atlantic footprint and, with the exception of New Jersey; Verizon's PAP plans are substantially similar." Verizon MA's November 8, 2005 letter from Bruce P. Beausejour to Secretary Cottrell, page 2. Are the differences in the plans, including the New Jersey plan, material, such that those differences would render ineffective any reliance by the Department on future audits of those plans for purposes of ensuring Verizon's compliance with its Massachusetts Performance Assurance Plan ("PAP") obligations? Please explain.
- DTE 1-2 Excluding the successful results of Verizon's two previous audits of the Massachusetts PAP, please explain in detail the basis upon which the Department can be confident of Verizon's continued compliance with its Massachusetts PAP obligations during years that an audit is not conducted in Massachusetts. Please explain in detail how the successful results of future audits of PAPs in the Verizon East footprint (or other Verizon states) and/or future FCC audits would serve as a reliable proxy for demonstrating continued compliance with Verizon's Massachusetts PAP obligations ("proxy states"), for those years when the Department does not conduct an audit. Are the systems and processes governing

PAP compliance in Massachusetts the same as the systems and processes in proxy states? Does Verizon automatically institute modifications resulting from an audit in one state to the PAP compliance processes of similarly situated states?

DTE 1-3 If the Department were to modify the audit requirement by expanding the time in between audits but selecting a sample time period from each year covered by the audit, what would be the impact on Verizon from both an administrative and cost standpoint?